EXHIBIT

E

Transcript of the Deposition of:

Walter Walker

Date: August 18, 2006

MACON COUNTY INVESTMENTS, INC, et al

Vs

SHERIFF DAVID WARREN

Case No. 3:06-CV-224-WKW

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A Yes, Exhibit B.
Q **All right. And were you personally familiar with that information on Exhibit B?**
A Yes. Yes. I can say, yes.
Q **You're familiar with that description, with that legal description?**
A He showed me where the thing would be and how it would be made and the pictures and all that. Is that what you're talking about?
Q **Well, look at Exhibit B. Go to Exhibit B, sir. You should have before you now Exhibit B to your application; is that correct?**
A Okay.
Q **Were you personally familiar -- Did you have personal knowledge of that particular description, legal description?**
A I might have seen it, read it, but what I was shown was the architectural scheme of things, drawings, and a layout.
Q **All right. So, you were not even shown this legal description.**
A I mean, if it was in here, I've seen it. I

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just don't remember. I don't remember half the stuff I'm looking at. You know, it probably was there. I just don't remember it.
Q **Did it mean anything to you?**
A Well, yeah. It seems like the scheme of things, lay it out through the things that was drawn.
Q **No, no, no, no. Here's what I'm asking. Did Exhibit B mean anything to you when you saw it?**
A You mean, if I cared or not? What do you mean if it means anything?
Q **Does it mean anything? Was it significant to you? As you read your application when you get to the part on page one where it says street address, real property described in the attached Exhibit B.**
A Oh, yes.
Q **And you looked at Exhibit B, does that mean something to you?**
A Yeah, it was an important document, I guess, explaining how and what the things being

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made. I assume when I read it, it might be me just presuming something was what he showed me from the picture and the architect drawing and all that. That's what I thought that might be.
Q **All right. Did you know where -- the meets and bounds, did you know where this Exhibit B -- what it was describing?**
A I just said the building that he showed me.
Q **Okay. This is about the building.**
A Yeah, the architect.
Q **All right.**
A The things that he showed me. That's what I assumed it was.
Q **All right. So, you assumed Exhibit B was an architectural rendering --**
A Of the building.
Q **-- of the building?**
A Yeah.
Q **All right. Then your application also says that you'll -- you have -- On page one. I'm still on the first page. How many days and weeks would bingo be conducted?**

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A Seven days a week.
Q **All right. And for how long?**
A Twenty-four hours.
Q **Did you understand that the bingo would be played for 24 hours a day, seven days a week?**
A Yes. I mean, I read this. And it's -- I read it. It didn't really make a difference.
Q **All right.**
A You understand?
Q **Yes, sir.**
A This legal mumbo jumbo I read it. Okay. Uh-huh (positive response). Just explain it to me. I'll do it. Fine. Signed and rolled on. I do not get off into this.
Q **All right. So, when you looked at the application, was it already completed?**
A I think the first time we talked it was not.
Q **All right. Did you --**
A Because they had phoned me to see if I would go through it if I wanted to do it. And he set down and talked to me. Greg sat down

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Q Right. And we do want the record to be clear. So, is that something that you have testified to during this deposition, that now that you have had a chance to think about it, you may have given some erroneous information?
A I would not call it erroneous. I don't remember.
Q Well, some wrong information?
A Well, you can call it wrong, whatever you say.
Q Something you want to correct?
A Okay. Now, we're straight with it.
Q Okay.
A Yeah, my wife, we did -- she filed with Reach One Teach One in Tallahassee.
Q Who did that?
A Well, let's say I did because I paid the money. It was seventy-eight ($78) dollars to do so. Fifteen ($15) dollars in Georgia. Seventy-eight ($78) in -- but I haven't filed with the other people.
MR. GRAY: Excuse me.

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(At which time, a recess was taken.)
Q Sir, let me just be clear about the offices of Reach One Teach One of America, Inc. You currently have -- is it two officers?
A Now, currently, yes.
Q And that's you and your wife.
A My wife right now.
Q All right.
A Until we have the special meeting and put Ollie in.
Q Is there some meeting at which your past secretary -- or is there some meeting at which Jackie Walker was relieved of her duties as secretary?
A Yeah.
Q Yes?
A Yes.
Q When was that meeting?
A I told you a week ago. Sometime a week. I don't remember. I can get the papers for you.
Q All right.

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MR. GRAY, JR: If you will get that, Counselor, and we would greatly appreciate it since we have requested all minutes of Reach One Teach One America, Inc.
Q Now, when was the fire? You talked about the fire on --
A I told you August 9th, 2004.
Q 2004. So, your entity has met since then, has it not?
A My wife and I.
Q All right. Okay. And you're still having annual meetings, are you not?
A Uh-huh (positive response).
Q When I say "you," I mean Reach One Teach One of America, Inc. And I may just call it Reach One Teach One, if that's okay.
A It's Reach One Teach One, yeah.
Q All right. So, when was your corporate meeting in 2004? What month was it in?
A 2004 is the month we left. Let's see. We went in August, so we did it in -- We always do it at the end of the year, December 31st.

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Q December 31st?
A Uh-huh (positive response).
Q All right. So, then, since the fire was before December 31st, you should have minutes for 2004.
A 2004, uh-huh (positive response).
Q All right. And so, you have those minutes; isn't that right?
A My wife has them.
Q All right. And for the year 2005 --
A My wife has them.
Q -- you have those minutes.
A Uh-huh (positive response).
Q All right. You will furnish those for us.
A I can get it.
Q All right. And for the year 2006, have you met yet?
A Well, it ain't December 31st yet.
Q All right. I thought I understood you to say that you met about a week ago.
A No, that was a special meeting. That was a special meeting.
Q Was it a meeting of your board?

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A Yeah.
Q All right.
A Yeah, but it's a special meeting. Listen, now. Let me clarify this again so you don't be redundant.
Q It's clear.
A Okay. All right.
Q You met a week ago.
A Okay. All right.
MR. GRAY: And those minutes you want to. Comes all the minutes since the fire.
A That's not a problem.
Q All right. Now, has Nadine Johnson ever been a secretary of your -- of Reach One Teach One?
A In Georgia. In Georgia. Don't you look at the papers in Georgia?
Q When was she the secretary? During what years or what months?
A I have no idea. Whatever it says on that piece of paper. You read it and tell me.
Q All right. Let me ask you something you can

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tell me about.
A Okay. Good.
Q In March 2006, you received from -- Did you receive -- Let me ask you this because I want to be right. I want to make sure I understand right. Did Reach One Teach One receive a check from Macon County Investments, Inc. --
A Yes.
Q -- in 2006?
A Yes.
Q All right. So, it was not a check from Frank Thomas --
A No.
Q -- but from Macon County Investments, Inc.; is that correct?
A Yes.
Q All right. And what bank was that check written on?
A Maxwell Air Force Base Credit Union that it was deposited into.
Q So, who signed that check?
A I did.

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Q You may not have understood my question, or I may have not have asked you what I thought I asked you. What I'm asking is whether the corporation of which Frank Thomas is the president, Macon County Investments, did that corporation write a check to Reach One Teach One of America?
A I'm under the understanding that it did. The money was there.
Q You're saying you're under the understanding. So, you physically received a check from Macon County Investments; is that correct?
A No.
Q Who received the check?
A Maxwell Air Force Base Credit Union.
Q Would that have been before this March 31st, 2006?
A Yes.
Q All right. So, did they just deposit the money into your account; is that what happened?
A Yes.

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Q Yes?
A Yes.
Q So, you never saw the check.
A No.
Q So, then, do you know for a fact that it was Macon County Investments?
A I just know for a fact that's what he told me it was.
Q All right. So, Frank Thomas told you that Macon County Investments gave Reach One that money.
A Yes.
Q All right. And the money did not come from Frank Thomas.
A Not to my knowledge.
Q All right. Now, does Reach One receive monthly or quarterly statements from Maxwell/Gunter Credit Union? What's the name of it? What's the official name of it?
A Yeah. It's Maxwell -- Well, over at Gunter it's Maxwell/Gunter because of an extension of Maxwell Air Force Base. It's Maxwell Air Force Base Credit Union.

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secretary?
A Well, that's wrong.
Q It says secretary.
A That's a mistake.
Q Well, is this secretary?
A That says secretary.
Q And who is the name next to the secretary?
A Nadine Johnson.
Q Is this treasurer?
A That's treasurer, but that's a mistake.
Q Who is the name next to the treasurer.
A That's a mistake.
Q What's the name?
A Nadine Johnson.
Q All right.
A But that's wrong. The treasurer is Mrs. Walker, so I made the mistake.
Q Okay.
A She is not the treasurer.
Q But you told Florida that she was.
A Well, I would have to go back and correct it.
MR. GRAY, JR: We offer Defendant's 11.

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MR. THOMAS: I don't have any objection. That's 11?
THE REPORTER: Yes.
Q All right. So, you filed an application to conduct business in Florida as indicated in Defendant's Exhibit 11; is that correct?
A Uh-huh (positive response).
Q All right. Did you receive anything from the State of Florida that granted that application?
A Yeah.
Q All right. No problems with that; is that correct?
A No problems.
Q Okay. And so, from January -- Is that when you first started doing business in Florida, January of 2005?
A Well, that's when I initiated it. I actually didn't start really doing -- you know, start doing anything for -- I think I was able to get a little cash. I'd have to go back. I can tell you what I did when I sit up and look at my financial reports or

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go back with my wife and talk with her and, you know, get the minutes.
Q Okay. So, is there anything in writing for the year 2005 that shows what Reach One Teach One of America did in furtherance of its nonprofit purposes in Florida?
A Uh-huh (positive response).
Q There is something?
A Uh-huh (positive response).
Q And what is that document?
A You mean, for what we did?
Q Yes. Tell us what you did.
A Well, just the minutes, you know, who we helping.
Q Okay. I show you what's been marked as Defendant's Exhibit Ten. What is that document, sir?
A This is the one from Georgia.
Q All right. Same kind of form?
A Well, basically.
Q All right. And what's the date it was filed?
A July 1998.

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Q July 1998?
A July 1, 1998.
Q All right. And who are the officers at that time?
A It was Pastor James Brooks, Cornelia, and myself.
Q All right. And who is Pastor James Brooks?
A Pastor James Brooks is the guy that actually established a food bank for his church.
Q Is there anything in writing that would show what Reach One Teach One did to benefit either his church or anyone else during the time period that you were doing business in Georgia?
A Well, he's not the pastor now, but I can probably try to get in touch with him in Georgia to find out if he has any other documents.
Q All right. Do you have anything in writing -- Does your corporation have anything in writing that tells what you have done or that you did?
A The stuff that we did, he had, Pastor Brooks

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had.
Q What's the name of the church?
A It's a Lutheran church. I forget the name of it. It's just Lutheran.
Q Is it the only Lutheran church in Lawrenceville, Georgia?
A It's not in Lawrenceville. It's in Columbus, Georgia.
Q Columbus? Okay. Is it the only Lutheran church in Columbus, Georgia?
A I don't know how many Lutheran churches are in Columbus, Georgia. He had a Lutheran church in Columbus, Georgia.
Q Okay.
A But he lived in Lawrenceville, so we used that particular address.
Q All right. At that time, did you live in Columbus, Georgia?
A No.
Q Did you use the Columbus, Georgia, address for this purpose?
A Yes, yes.
Q For what purpose?

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A For the 501(c)(3) of the church.
Q All right. I think I asked -- I know that I asked you about bank accounts --
A You sure did.
Q -- in Alabama and Florida. Does Reach One Teach One currently have a bank account in the State of Georgia?
A No.
Q Have you ever had a bank account in the State of Georgia?
A No.
Q Has it ever had any other bank accounts other than the two that you have --
A No.
Q -- mentioned earlier? Does Reach One Teach One have any assets?
A Now?
Q Now.
A No.
Q Did it have any assets in January of 2006?
A Assets?
Q Anything.
A Buildings, cars?

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Q Buildings, cars, personal property, real property, money in the bank, CDs, stocks?
A No, no, we can't do that. What we did I had -- What I did is -- have given several cars away, vehicles.
Q From Reach One Teach One?
A From Reach One Teach One for people who needed cars to go to work.
Q All right. When is the time most recently that you did that?
A Oh, man. Let's see. '98, 2001. Well, we're getting ready to give away one now. But I can't recollect. You know, it's one -- they're on the tape. I know one of the females I gave -- a couple I gave cars to are on the tape.
Q On the tape.
A Yeah.
Q All right. So, this would be something that happened before 2002 or 2003.
A Well, some of them I did in Alabama and in Georgia. Because right now, I got a '98 Mercedes and four or five other cars, and I

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just give them. You know, I give them away.
Q All right. But there's nothing in writing, though. So, there's nothing on that tape that's going to show us anything --
A Yes, yes.
Q -- post 2003. I mean, after 2003.
A I'd have to look at it, man. I know one we did 1996 to whatever this one started. Then we had the other one. I don't know. I'd have to look at it. I really don't know. And I have -- my TV has where the time, date stamp on it, so I'd have to put it into my TV and find out what the time date stamped on it.
Q All right. Now, on these cars that you're getting ready to give away, are these cars titled in -- Well, you say you're getting ready to give one particular one away.
A Uh-huh (positive response).
Q All right. What car is it that you're getting ready to give away?
A Well, this might be a Plymouth Breeze. And the procedures I use, actually, when it's my

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vehicle --
Q **All right. Let me ask you this question.**
A Okay.
Q **Right now, in whose name is the car titled?**
A To me.
Q **Not Reach One Teach One?**
A Yeah. I can't give it away from me. I have to put it in Reach One Teach One's name then pass it on.
Q **So, does Reach One Teach One own any cars right now?**
A No.
Q **What is the -- What is the reason that you go through Reach One Teach One to give away a car?**
A Well, it's the same way that Frank gives me money to give to you. So, if I have something, I put it into the Reach One Teach One name that it may benefit from the Reach One Teach One. If I give the car, my name is Walter Walker, then Reach One Teach One wouldn't have given it, Walter Walker would have. So, in order to relinquish that, I

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put the car in Reach One Teach One's name, take it to the particular -- find a person who actually needs the car and just title the car. The car is titled. It was titled a gift.
Q **All right. And that benefits you with your tax returns per year?**
A No, man. You crazy? No. How is it going to do that when I'm giving it from a 990 and I do a 1040?
Q **All right. So, does it benefit you, the individual, at all as far as your taxes are concerned?**
A How can it?
Q **Just say yes or no.**
A It's no.
Q **Okay. And does it benefit Reach One Teach One?**
A No, it doesn't benefit anybody. It's just giving it away. How is it a benefit?
Q **All right. Now, how many times has Reach One Teach One given a car away to a person that needed one?**

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A It's probably the third time.
Q **All right. When was the last time you did it?**
A Probably 2000.
Q **And to whom did you give a car in the year 2000?**
A I do not remember. I forget my children's names. So, I have no idea.
Q **All right. And where did Reach One Teach One deliver the Car?**
A Right down here off Montgomery Highway.
Q **Tuskegee?**
A Uh-huh (positive response).
Q **Does Reach One Teach One have a corporate headquarters?**
A Uh-huh (positive response), yeah.
Q **What is it's formal address?**
A Well, 211 Oslin Drive.
Q **211 Oslin?**
A Uh-huh (positive response).
Q **What is the legal status of Reach One Teach One?**
A What is the legal status? It's a 501(c)(3).

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It's recognized under the Internal Revenue Service as a charitable educational organization.
Q **All right. Not a private foundation?**
A No.
Q **I'm going to try to see if we can get a little more definitive answers from you about the work of Reach One Teach One.**
Now, you told me that you do not file a 990 because you don't have to because you haven't reached -- or you don't reach that threshold amount.
A Twenty-five thousand ($25,000) dollars, yes.
Q **And it seems like you said twenty-five hundred ($2,500) dollars in grant as opposed --**
A Twenty-five thousand ($25,000) dollars.
Q **-- twenty-five thousand ($25,000) right, as opposed to twenty-five thousand ($25,000) dollars in revenue for a year; is that --**
A Well, that would be basically the same thing. Because in order to get the revenue, it has to be granted.

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A You know, I guess they could use me.
Q All right.
A What they couldn't do is, I don't know, you know, just get the license.
Q All right.
A And that's all I wanted to know.
Q All right. And they mentioned Sheriff Warren?
A Yeah. He's the one that's -- He's the final say-so for it.
Q All right. And so, what did they say other than that he's the final say-so for it?
A That's it.
Q Did they say it was a problem communicating with him?
A I didn't get into that part. See, listen to what I'm saying. I don't get into that part.
Q All right.
A All he said what they can do or can't do. All the other stuff with that, I'm not in that.
Q So, what did you tell them you would do

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since you said that you knew David?
A Well, I thought -- Well, let me talk to him, you know, because David and I grew up together. You know, and I know David. David knows me. And he said, "No. I think it's best that you don't." I said, "Yeah, whatever. Okay." I said, "I know I can talk to him, but if you guys don't want me to, I won't."
Q All right. And all these conversations were before you actually met Greg Carr face-to-face; am I right?
A Yeah.
Q All right. And this conversation would have been around April or early May 2005.
A Somewhere in there because I met Frank in May. See, you are pinpointing dates that's not significant to me. You know, I'm saying sometime in May when he called me, yeah, okay. Right. And we set up for, like, late May, somewhere in there. And then that's where I met Frank and Mr. Carr together.
Q All right. And that was your first time

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meeting Frank Thomas?
A First time.
Q Late May.
A I had spoken to him on the telephone.
Q All right. Late May. Frank Thomas and Greg Carr. Was there anybody else there at that meeting?
A No.
Q And where did you --
A Oh, my wife was with me.
Q Your wife. Okay. And where was that meeting?
A Montgomery, Alabama.
Q All right. And did you and your wife come up from Florida to meet with them?
A Yeah.
Q All right. Did you drive up?
A Yeah.
Q Did they pay your expenses to come up?
A The first time, I think Greg gave me something for coming up.
Q Who did?
A Oh, that's right. That's right. That's

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right. That's right. I met Greg first before I met Frank, before Frank was together. Then when I came up, I gave them all my information, showed that I was a pertinent 501(c)(3), 1023, Letter of Determination. Then it was just me and Frank -- I mean, Attorney Carr and myself.
Q All right. So, you met Attorney Carr first.
A Yes, yes.
Q Would that have been late May?
A Uh-uh (negative response). That was before I met Frank. I met Frank in late May. So, between that month of May is when everything happened.
Q All right. So, when you met Greg Carr, what did you and he talk -- Did he give you an application?
A No.
Q Did he say anything about an application?
A No, no. When I met Greg Carr, all I did is give him all the documents that makes me legal. I gave him my 1023s, 8717s, 872s. I put all that together.

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Q Now, let me stop you for a moment because you're putting a lot of numbers out there. Let's take each one and say what it is. 1023, what is that?
A Well, that's the thing that denotes that I'm a nonprofit.
Q All right. It's an application for a nonprofit?
A Uh-huh (positive response).
Q All right. Next.
A 8718 is the paperwork you sign and put yourself to put the money into.
Q All right. The 8718? All right. That's not the power of attorney?
A No.
Q Okay. What did you say that is?
A It's either 8717 or 8718.
Q What is it?
A You know, when you put your money together, you put your check. You fold it up and put it in with it, and you put all your pertinent information there.
Q Okay. It goes along with the form?

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A Yeah. And the 872Cs are what you put together when you want advanced ruling.
Q All right. And these are also forms that go to the IRS?
A Exactly.
Q Yes, sir. And so, you gave them copies of your -- of all those forms.
A And the by-laws and all that stuff, yes. That's all I did with him. That's it.
Q All right.
A Any conversation about blah, blah this and this and that, blah, blah, blah, I wouldn't --
Q All right. Now, did he tell you at that time that he wanted Reach One Teach One to apply for a license to conduct bingo in Macon County?
A They told me that when I met with Mr. DeBray.
Q From the beginning?
A Yes.
Q All right. And when you came up in May and met with him, did your wife come with you

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that first time?
A No.
Q All right. And did he pay your expenses that time?
A Yes.
Q How much did he pay you?
A Three hundred ($300).
Q And was that cash or a check?
A Cash. But Greg paid that.
Q When you say "Greg," you mean Greg Carr?
A I'm sorry. Yes, Attorney Carr.
Q I just want to make it clear that we are talking about who I think.
A Yes.
Q All right. And did he tell you at the time that he was a shareholder with Frank Thomas?
A No, no. We didn't get into that. No, no, no. Again, my issue was to put the 501(c)(3) in place, give them all the pertinent information. All the mumbo jumbo you guys fight for, I don't even want to know about.
Q Okay. And then you met with Frank Thomas.

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A Yeah.
Q And that was a whole another trip up.
A Yeah. My wife, myself, Frank, and Mr. Carr, Attorney Carr.
Q Now, when did you first learn that charities could obtain a license to play bingo? When did you first learn that?
A Mr. Tom DeBray, brother.
Q All right. And that would have been in November, December 2004?
A Uh-huh (positive response).
Q Yes?
A Yes.
Q Did you vote in the referendum for the bingo?
A Yes.
Q I'm not asking did you vote in favor of it. I'm just asking did you vote in that.
A Yes. I've been voting each year in Tuskegee.
Q Yes, sir. Now, so, when you met Frank Thomas, what was the substance of your conversation then?